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Secretary for  
Environmental Protection

# California Regional Water Quality Control Board San Diego Region

Over 50 Years Serving San Diego, Orange, and Riverside Counties  
Recipient of the 2004 Environmental Award for Outstanding Achievement from U.S. EPA



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Distribution List

## REGIONAL PREPARATIONS FOR SAN DIEGO RAIN SEASON

Dear MS4 Copermittees:

This letter is a reminder to take all practicable actions to prepare for coming rainstorms that we anticipate will occur early in this rainfall season. Your municipal storm water NPDES permit requires that you implement such best management practices to the maximum extent practicable to reduce discharges of waste into our regional waters. It has been many months since our last significant rainfall. The accumulation of pollutants and debris since the last rainfall event this spring presents both a challenge and an opportunity for our Region. The challenge lies in the accumulation of trash and other wastes in your storm drain system that will be swept downstream with the first flush of the first significant rainfall. The opportunity is that we have a few weeks left to cleanup areas tributary to your storm drain system and to remove accumulated waste within your storm drain system. There is increasing focus on the protection of our inland waters, bays and estuaries as well as a growing awareness of the need to reduce waste discharges to the ocean. In addition to the need to remove waste from your storm drain system, I encourage you to consider specifically the following actions to prepare for the coming rains this year.

### Construction Sites

There are many active and inactive construction sites in our Region that are in need of new and replacement erosion prevention measures. Sites with disturbed soils where construction has been halted due to the slowdown in the building industry are particularly vulnerable to runoff problems. Each Copermittee should take action to locate and assess construction sites to ensure that the responsible parties take action to prepare the sites prior to the first significant rainfall. At active construction sites, the same actions are also needed to protect receiving waters from sediment discharges.

### Residential Areas

In many residential areas significant amounts of debris have accumulated in the curbs and gutters that will be washed into the receiving waters with the first significant rain. I request an aggressive pre-rain season campaign to involve the residential owners to cleanup their properties and the adjacent curbs and gutters to remove any trash, sediments or landscaping debris to prevent it from being washed into the storm drains

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and creeks. The use of street sweepers and vac-trucks are also an effective means to remove wastes from streets, curbs and catchments. It is far more efficient and beneficial to remove wastes from the pavements, curbs and catchments than from the creeks, lagoons and bays. If these wastes are discharged into these receiving waters, the impact is extremely difficult and costly to mitigate.

#### Industrial Areas

Fortunately, the operators of many industrial activities in the Region are participating in the state industrial storm water permit. Even so, a significant number are not. As mentioned earlier, many consecutive dry months has resulted in the need to assess the level of preparation for the initial rainfall. These sites need to be cleaned and protective measures taken to prevent potential discharges of waste. Industrial site owners should be encouraged to make an extra effort to attend to this concern.

#### Commercial and Public Areas

Shopping centers, parks and other public areas should be inspected to ensure that measures are taken to prevent the discharges of trash, debris and sediments caused by urban runoff. Some of these areas have runoff treatment devices that require maintenance and service prior to the first significant rainfall. Property managers should be advised to ensure that parking areas and boundary areas are given particular attention to ensure that wastes have been removed to the extent practicable along fence lines, swales and ditches.

The Regional Board appreciates your past efforts to prevent the discharges of waste to our receiving waters. We are preparing to step up our monitoring and surveillance of all municipal, industrial and construction sites in the Region to assist you. Prior to the first significant rain fall we will notify you of any sites we become aware of that are in need of cleanup or preparation actions. As the rain season progresses, we will pursue enforcement actions for failures to take these prudent preventative measures, particularly if there are resulting discharges of trash, sediments or excessive debris. I hope you will join with the Regional Board in this campaign of preparation for our first significant rain storm.

Sincerely,



John H. Robertus  
Executive Officer

San Diego Regional Water Quality Control Board

cc: Terry Rodgers, Union Tribune